

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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JAMES R. HEARNS, JR.,

Plaintiff,

vs.

JEFF WYLER FAIRFIELD, INC., et al.,

Defendants.

Case No. C-1-02-496

District Judge Susan J. Dlott

JOINT MOTION TO EXTEND DEADLINES

Now comes all parties jointly, by and through their undersigned counsel, and hereby move this Honorable Court for an extension of deadlines set forth in the Pre-Trial Order of this Court entered on October 16, 2002.

Both parties have discovery requests pending and are amicably working together to resolve these issues. However, there are additional documents and interrogatories which still need to be exchanged. The parties should be able to resolve these discovery issues with no court intervention. However, the parties will need additional time to fully complete discovery and prepare the case for trial.

The parties propose the following extensions, subject of course to the approval of this Honorable Court:

Discovery cutoff:	1/1/04
Last Date to file dispositive motions:	2/1/04
Memoranda contra due:	2/25/04
Reply Memoranda due:	3/8/04
Date to file joint proposed final pre-trial order:	4/1/04
Final pre-trial conference:	Date convenient with court
Trial:	Date convenient with court.

WHEREFORE, all parties move this Court to issue an Order extending the deadlines for completion of discovery, dispositive motions, pre-trial and trial.

Respectfully Submitted,



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